

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

CHARLES A. WAKEFIELD,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. CIV-17-1006-R
	)	
SODEXO USA,	)	
	)	
Defendant.	)	

**DEFENDANT SODEXO OPERATIONS, LLC'S FINAL LIST OF EXHIBITS**

Defendant Sodexo Operations, LLC ("Sodexo"), hereby submits its final list of exhibits in this matter. Discovery is ongoing, and Sodexo hereby reserves the right to amend this list as the Court may allow. Sodexo's final list of exhibits is as follows:

**I. Exhibits Expected to be Used**

<b>No.</b>	<b>Exhibit</b>	<b>Bates Label</b>
1.	Plaintiff's Resume	WAKEFIELD 3680–3683
2.	Letter to Plaintiff dated January 16, 2008 re: merit increases for FY07	SODEXO 0869
3.	Letter to Plaintiff dated January 14, 2009 re: merit increases for FY08	SODEXO 0873–0874
4.	Prospective Job Posting Exemption Authorization Form	SODEXO 0876–0877
5.	Plaintiff's FY10 Annual Review	SODEXO 1057–1058
6.	Letter to Plaintiff dated January 10, 2011 re: merit increases for FY10	SODEXO 0882
7.	Letter to Plaintiff dated January 10, 2012 re: termination from Langston University contract	SODEXO 0885–0889
8.	Email to Tina Mattis dated October 2, 2012 re: Offer Accepted by Plaintiff	SODEXO 0894–0895
9.	Performance Improvement Plan issued to Plaintiff on March 11, 2013	SODEXO 1071–1072
10.	Plaintiff's FY13 Annual Review	SODEXO 1073–1084

11.	Documented Coaching issued to Plaintiff on February 10, 2014	SODEXO 1085
12.	Letter to Plaintiff dated April 18, 2014 re: failure to meet requirements for FY14 merit increase	SODEXO 1009
13.	Constructive Counseling/Written Coaching and Action Plan issued to Plaintiff on October 6, 2014	SODEXO 1105–1114
14.	Plaintiff's FY14 Annual Review	SODEXO 1089–1101
15.	Client Visit Report from Patricia O'Hara dated March 2, 2015	SODEXO 2405–2409
16.	Email from Lisa Failing to Plaintiff dated April 13, 2015 re: Plaintiff's disagreement with FY14 Annual Review	SODEXO 1252
17.	Email chain from Kevin Benda to Lisa Failing dated August 14, 2015 re: Environmental Services Manager 2 Salary	SODEXO 1283–1289
18.	Constructive Counseling Letter with Action Plan issued to Plaintiff on September 16, 2015	WAKEFIELD 3487–3493
19.	Letter to Plaintiff dated September 21, 2015 re: pay rate change	WAKEFIELD 3494
20.	Email chain from Trina Anzalone to Kevin Benda and Lisa Failing dated September 28, 2015 re: Plaintiff's rejection of his pay increase	SODEXO 1538–1540
21.	Email chain from Plaintiff to Lisa Failing dated September 30, 2015 re: Plaintiff's rejection of his pay increase	SODEXO 1304–1305
22.	Email chain from Plaintiff to Lisa Failing dated October 2, 2015 re: Plaintiff's rejection of his pay increase	SODEXO 1576–1579
23.	Email chain from Chuck Thomas to Plaintiff dated October 7, 2015 re: Plaintiff's rejection of his pay increase	SODEXO 1323–1327
24.	Plaintiff's FY15 Performance Review	WAKEFIELD 3495–3510
25.	Action Plan issued to Plaintiff on September 16, 2015 with Results/Follow-up Comments	SODEXO 1157–1171
26.	Constructive Counseling/Written Warning issued to Plaintiff on January 19, 2016	SODEXO 1172–1175
27.	Fax from Plaintiff to Barbara Peck dated February 23, 2016 re: Plaintiff's comments to his January 19, 2016 Constructive Counseling/Written Warning	SODEXO 1184–1188
28.	Constructive Counseling/Termination Notice issued to Plaintiff on February 23, 2016	SODEXO 1189–1201

**II. Exhibits Which May Be Used if the Need Arises**

<b>No.</b>	<b>Exhibit</b>	<b>Bates Label</b>
29.	Plaintiff's EEOC Charge of Discrimination dated October 21, 2015	WAKEFIELD 3522–3523
30.	Plaintiff's EEOC Intake Questionnaire and Attachment A submitted August 21, 2015	WAKEFIELD 3530–3534
31.	Plaintiff's EEOC Charge of Discrimination submitted March 22, 2016	WAKEFIELD 3558
32.	Plaintiff's EEOC Intake Questionnaire submitted February 8, 2016	WAKEFIELD 3574–3577
33.	Plaintiff's EEOC Charge of Discrimination submitted February 22, 2017	WAKEFIELD 3662–3663
34.	Plaintiff's EEOC Intake Questionnaire submitted November 11, 2017	WAKEFIELD 3670–3673
35.	Plaintiff's Responses to Defendant Sodexo Operations LLC's First Set of Interrogatories to Plaintiff	
36.	All exhibits which may be identified through on-going discovery and not objected to by Defendant	
37.	All exhibits listed by Plaintiff not objected to by Defendant	
38.	Exhibits attached to depositions not objected to by Defendant	
39.	Exhibits necessary for impeachment of and/or rebuttal of Plaintiff's witnesses and/or exhibits	
40.	Demonstrative exhibits, visual aids, and summaries	

Respectfully submitted,

/s/Jeremy Tubb

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 26, 2018, I electronically transmitted the foregoing document to the Court Clerk using the ECF System for filing. The Court Clerk will transmit a Notice of Electronic Filing to the following ECF registrants:

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/s/Jeremy Tubb

Jeremy Tubb